

**ANDERSON KILL P.C.**

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Via ECF

May 30, 2025

The Honorable George B. Daniels  
Daniel Patrick Moynihan United States Courthouse  
U.S. District Court for the Southern District of New York  
500 Pearl Street, Courtroom 11A  
New York, NY 10007

*Re: In re Terrorist Attacks on September 11, 2001*, No. 03-MDL-1570 (GBD) (SN);  
*Morris v. Islamic Republic of Iran*, No. 1:18-cv-05321 (GBD)(SN); *Schlissel v. Islamic Republic of Iran*, No. 1:18-cv-05331 (GBD)(SN); *Ades v. Islamic Republic of Iran*, No. 1:18-cv-07306 (GBD)(SN); *Abel v. Islamic Republic of Iran*, No. 1:18-cv-11837 (GBD)(SN); *Jimenez v. Islamic Republic of Iran*, No. 1:18-cv-11875 (GBD)(SN); *Rivelli v. Islamic Republic of Iran*, No. 1:18-cv-11878 (GBD)(SN); *Hemenway v. Islamic Republic of Iran*, No. 1:18-cv-12277 (GBD)(SN); *Rowenhorst v. Islamic Republic of Iran*, No. 1:18-cv-12387 (GBD)(SN); *BNY Mellon v. Islamic Republic of Iran*, No. 1:19-cv-11767 (GBD)(SN); *Bernaerts v. Islamic Republic of Iran*, No. 1:19-cv-11865 (GBD)(SN); *Hargrave v. Islamic Republic of Iran*, No. 1:20-cv-09387 (GBD)(SN); *Asaro v. Islamic Republic of Iran*, No. 1:20-cv-10460 (GBD)(SN); *Amato v. Islamic Republic of Iran*, No. 1:21-cv-10239 (GBD)(SN); *King v. Islamic Republic of Iran*, No. 1:22-cv-05193 (GBD)(SN); *Strauss v. Islamic Republic of Iran*, No. 1:22-cv-10823 (GBD)(SN); *Kone v. Islamic Republic of Iran*, No. 1:23-cv-05790 (GBD)(SN); *Lopez v. Islamic Republic of Iran*, No. 1:23-cv-08305 (GBD)(SN); *Burnett v. Islamic Republic of Iran*, No. 1:15-cv-09903 (GBD)(SN); *Moody-Theinert v. Islamic Republic of Iran*, No. 1:18-cv-11876 (GBD)(SN); *Aamoth v. Islamic Republic of Iran*, No. 1:18-cv-12276 (GBD)(SN); *Bodner v. Islamic Republic of Iran*, No. 1:19-cv-11776 (GBD)(SN); *Fennelly v. Islamic Republic of Iran*, No. 1:23-cv-10824 (GBD)(SN); *Bianco v. Islamic Republic of Iran*, No. 1:20-cv-10902 (GBD)(SN); *Kelly v. Islamic Republic of Iran*, No. 1:23-cv-07283 (GBD)(SN); *Jelnek v. Islamic Republic of Iran*, No. 1:24-cv-05520 (GBD)(SN) – ECF No. 10997

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Dear Judge Daniels:

We write regarding the judgment entered by the Court today in the above-referenced actions. *See* ECF No. 10997. There the Court denied without prejudice the motions of the following four plaintiffs:

**Anderson Kill P.C.**

The Honorable George B. Daniels  
May 30, 2025  
Page 2

- (1) Christopher Cuomo as Personal Representative of the Estate of Vanessa Lang Langer because “Cuomo is not the correct Personal Representative for Vanessa Lang Langer. The Public Administrator of Westchester County is the listed Personal Representative for Langer. (See ECF No. 10486.)”<sup>1</sup>
- (2) Hillary Hans’ and Leslie Reuben’s claims for supplemental economic damages as co-Personal Representatives of the Estate of Ronald J. Ruben
- (3) Theresa Russo-Kempf’s claim for supplemental economic damages as personal representative of the Estate of Michael Russo
- (4) Ayleen Arroyo and George Santiago’s claims for supplemental economic damages as the co-Personal Representatives of the Estate of Ayleen J. Santiago.

Regarding (1), the Estate of Vanessa Lang Langer, undersigned counsel notes that Christopher Cuomo is the Public Administrator of Westchester County. *See* <https://www.westchestergov.com/contact-the-westchester-county-pa> (last visited May 30, 2025). Undersigned counsel also notes that the United States Victims of State Sponsored Terrorism (“VSST”) Fund has extended the deadline for new claimants to apply to the Fund for Sixth Round distributions to **Monday, June 2, 2025**. Of the four above estates, only the Estate of Vanessa Lang Langer would be a new VSST Fund claimant. Accordingly, undersigned counsel respectfully requests the Court enter a judgment in favor of Christopher Cuomo, the Public Administrator of Westchester County, on behalf of the Estate of Vanessa Lang Langer, and encloses herewith a proposed order entering a judgment for this claimant.

The other estates identified above already obtained damages judgments from this Court and are now only seeking supplemental economic damages to enhance their existing claims before the VSST Fund. The Fund has not set a deadline for submitting these supplemental claims to the Fund for Sixth Round distributions. Accordingly, undersigned counsel intends to file with the Court the appropriate paperwork for these estates early next week.

We thank this Court for its consideration of this request.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

*Attorney for the Plaintiffs*

Enclosure

Cc (via ECF): Magistrate Judge Sarah Netburn  
All MDL Counsel of Record

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<sup>1</sup> ECF No. 10997 appears to list this estate twice, in footnote four and footnote 5.